

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CESAR REYNALDO RAMIREZ ROSARIO  
YOLANDA REYES COLLAZO

DEBTORS

\*\*\*\*\*

\* CASE NO. 14-08338 ESL  
\*  
\* CHAPTER 13  
\*  
\*

**DEBTORS' REPLY TO MOTION TO DISMISS  
FILED BY FIRSTBANK PUERTO RICO DOCKET ENTRY #30**

TO THE HONORABLE COURT:

COMES NOW, **CESAR REYNALDO RAMIREZ ROSARIO and YOLANDA REYES COLLAZO**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On May 16, 2016, First Bank Puerto Rico ("First Bank") filed a Motion to Dismiss, docket entry #30, whereby a dismissal of debtors' Chapter 13 case is requested based on alleged arrears on the debtors' confirmed Plan payments to the Trustee.

2. The debtors hereby respectfully inform this Honorable Court that on May 26, 2016, the debtors made a \$250.00 payment to the Trustee (confirmation #182704092), which sum is in arrears on the debtors' confirmed Plan payments to the Trustee, docket entry #27. Attached is evidence of payment made to the Chapter 13 Trustee to cure the aforementioned confirmed Plan arrears.

3. The debtors hereby respectfully inform this Honorable Court that they cured the Plan arrears and that they are up-to-date in the confirmed Plan payments. The debtors respectfully reply to First Bank's motion for dismissal submitting evidence of having cured the Plan arrears, in the above captioned case.

Page – 2 -  
Debtors' Motion In Compliance with Order  
RE: Curing of Plan Arrears  
Case no. 14-08338 ESL13

**WHEREFORE**, the debtors respectfully request that based on the aforestated, this Honorable Court grant the present reply and deny First Bank's motion for dismissal, docket entry #30, in the present case.

**I CERTIFY** that on this same date a copy of this motion was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of same to Jose Ramon Carrion Morales, Esq., Chapter 13 Trustee; Maricarmen Colón Diaz, Esq., Counsel for First Bank Puerto Rico; and via regular mail to the debtors Cesar Reynaldo Ramirez Rosario and Yolanda Reyes Collazo, Urb Villas de San Cristobal II 393 Caoba Street Las Piedras PR 00771.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 31<sup>st</sup> day of May, 2016.

*/s/Roberto Figueroa Carrasquillo*  
USDC #203614  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
ATTORNEY FOR PETITIONERS  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787-744-7699 FAX NO 787-746-5294  
Email: [rfigueroa@rfclawpr.com](mailto:rfigueroa@rfclawpr.com)



## Pay Your Bill Now

• Profile user name is required.

• Password is required.

1. Enter Payment Info | 2. Review Payment Info | 3. Confirmation

Your payment has been successfully  
scheduled  
It will be posted in approximately one business day.



Confirmation Number 182704092

Monthly Plan Payment \$0.00

Delinquency Amount \$250.00

Tax Refund Payment \$0.00

Other Payment Amount \$0.00

Reason for Other Payment

Amount to be Paid \$250.00

Fee \$1.00

Total \$251.00

Payment Method Bank

Bank Name COOP DE AHORRO Y CREDITO LAS  
PIEDRAS

Routing Number (ABA) \*\*\*\*\*2853

Bank Account Number (DDA) \*\*\*\*\*8180

Payment Posting Date 05/26/2016

### Enroll Now!

#### Features:

- Flexibility: Alerts. Email alerts available.
- Security: No more stamps, paper checks or money orders.
- Convenience: No more stamps or paper checks.
- Payment History: 13 months of online payment history.
- Schedule automatic payments.
- Low Cost: \$1.00 convenience fee per transaction.

[Enroll Now!](#)

### Receive an email confirmation and set up your account

Enter your email address and receive an email confirmation of this payment. Then enter a user name and password to log in next time. Your user name and password will be your log in information.

Email Address

User Name  (The user name must be a minimum of 8 and a maximum of 32 alphabetic and/or numeric characters. The user name cannot contain special characters or spaces.)

Password  (Must be at least 8 characters long and contain at least one number.)

Re-type Password